

**CUSTOMER NO.: 24498****Serial No. 09/610,719**

Reply to Office Action dated: 06/22/05

Response dated: 09/13/05

**PATENT  
BTSPH099090****REMARKS**

In the Office Action, the Examiner noted that claims 1-10 are pending in the application, that claims 1-9 are allowed and that claim 10 stands rejected. By this response, claim 5 is amended to correct for a formality error and claim 10 is amended to place claim 10 in condition for allowance.

In view of the amendments presented above and the following discussion, the Applicant respectfully submits that none of these claims now pending in the application are anticipated under the provisions of 35 U.S.C. § 102. Thus the Applicant believes that all of these claims are now in allowable form.

**Rejections****A. 35 U.S.C. § 102**

The Examiner rejected claim 1-10 under 35 U.S.C. § 102(b) as being anticipated by Berry et al. ((U.S. Patent 5,311,302, hereinafter "Berry"). The rejection is respectfully traversed.

The Examiner alleges that regarding claim 10, Berry discloses a modular control unit for a control panel including all of the limitation of the Applicant's invention. The Applicant respectfully disagrees.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim" (Lindemann Maschinenfabrik GmbH v. American Holst & Derrik Co., 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1983)) (emphasis added).

The Applicant submits that the Berry reference fails to teach, suggest or disclose each and every element of at least the invention as recited in the Applicant's independent claim 10, which specifically recites:

"A modular control unit (3) for a control panel (2) for video apparatus, the control unit (3) comprising at least an operating module (31) and a control module (32), the control module (32) comprising a first interface (37) for connection to the control panel (2) and at least a second interface (35) for connection of the operating module (31), and the operating module (31) comprising at least an interface (34) for connection to the control module (32), the operating module (31) further comprising a plurality of mechanical keys, each of said plurality of mechanical keys (33) having a corresponding liquid crystal display integrated with each key such that a function of each key can be juxtaposed and reassigned to another key."

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More specifically, Berry is directed to a video terminal used for playing video for a passenger in a vehicle. Upon review of Berry, Berry fails to disclose or suggest, *inter alia*, ... a plurality of mechanical keys, each of said plurality of mechanical keys (33) having a corresponding liquid crystal display integrated with each key such that a function of each key can be juxtaposed and reassigned to another key.

In accordance with the Examiner's rejection, Berry includes a plurality of keys with an LCD display. Claim 10 has been amended to further clarify that the keys are known to be mechanical elements, such as the keys of a keyboard. The liquid crystal displays also recited in claim 10 include small displays corresponding to each key. Support for the amendment may be found, throughout the Applicant's specification and specifically in the second paragraph of the Detailed Description.

FIG. 4 of Berry discloses and shows a liquid crystal display screen divided into fields and indicates a user selection by touching one of these fields. The fields are virtual elements however and are not mechanical. In addition, the fields do not have a corresponding liquid crystal display integrated with each mechanical key. The present invention includes an individual display, e.g., 36 by 24 pixels, for each key. This is not disclosed or suggested by Berry. In addition, the mechanical keys may have a function of each key juxtaposed and reassigned to another key. This is also not disclosed or suggested by Berry since there would be no motivation to provide such a capability.

Since Berry fails to disclose or suggest all of the elements of claim 10, claim 10 is believed to be in condition for allowance for at least the reasons stated. That is, the Applicant submits that for at least the reasons recited above independent claim 10 is not anticipated by the teachings of Berry and, as such, fully satisfies the requirements of 35 U.S.C. § 102 and is patentable thereunder.

#### Conclusion

The Applicant notes with appreciation the allowance of claims 1-9. However, the Applicant further submits that claim 10 is not anticipated under the provisions of 35 U.S.C. § 102 in view of the currently cited prior art. Consequently, the Applicant believes that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

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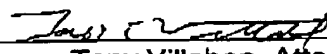
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If however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion, it is respectfully requested that the Examiner telephone the undersigned.

No fee is believed due. However, if a fee is due, please charge the additional fee to Deposit Account No. 07-0832.

Respectfully submitted,  
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